

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY AVERAGE WHOLESAL PRICE LITIGATION

MDL NO. 1456

CIVIL ACTION NO. 01-CV-12257-PBS

THIS DOCUMENTS RELATES TO
ALL ACTIONS

Judge Patti B. Saris

**ASTRAZENECA PHARMACEUTICALS LP'S ASSENTED-TO MOTION FOR
EXTENSION OF TIME TO RESPOND TO MOTIONS FILED AUGUST 31, 2005**

Pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 7.1(b)(2), AstraZeneca Pharmaceuticals LP (“AstraZeneca”) respectfully requests that the Court briefly extend the time within which AstraZeneca must respond to the plaintiffs’ motion to compel the deposition of David Brennan, which was filed on August 31, 2005, as well as plaintiffs’ supplemental motions concerning privilege issues and another Fed. R. Civ. P. 30(b)(6) deposition, which were also filed on August 31, 2005. With the requested extension, the opposition briefs will be due September 15, 2005.

Due to the multiplicity of discovery issues which have recently been before this Court, AstraZeneca has been occupied with dealing with those issues. Accordingly, AstraZeneca respectfully requests that the Court extend the time for AstraZeneca to respond to the plaintiffs' motion to compel and supplemental motions to and including September 15, 2005.

Dated: September 14, 2005

By: /s/ Lucy Fowler

Nicholas C. Theodorou (BBO # 496730)
Lucy Fowler (BBO #647929)
FOLEY HOAG LLP
155 Seaport Boulevard
Boston, MA 02110
(617) 832-1000

D. Scott Wise (admitted *pro hac vice*)
Kimberley Harris (admitted *pro hac vice*)
DAVIS POLK & WARDWELL
450 Lexington Avenue
New York, NY 10017
(212) 450-4000

Attorneys for AstraZeneca Pharmaceuticals LP

Certification Pursuant to Local Rule 7.1

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that counsel for defendants conferred with counsel for plaintiff on this motion, and that counsel for plaintiff assented to the motion.

/s/ Lucy Fowler
Lucy Fowler

Certificate of Service

I, Lucy Fowler, certify that a true and correct copy of the foregoing document was served on all counsel of record on September 14, 2005, by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending a copy to Verilaw Technologies for posting and notification to all parties.

/s/ Lucy Fowler
Lucy Fowler